

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SARA SHANNON and ROSA PALACIOS
and DEBRA CORBELLO, Individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

THE ALLSTATE CORPORATION,

Defendant.

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CIVIL ACTION NO. 1:20-cv-00448-LY

**DEFENDANT’S UNOPPOSED MOTION FOR
INCREASE IN PAGE LIMIT FOR DISPOSITIVE MOTION**

Pursuant to Local Rule CV-7(d)(3), Defendant The Allstate Corporation (“Allstate”) respectfully requests that the Court grant this Unopposed Motion to increase the page limit for Allstate’s dispositive motion to dismiss to 40 pages.¹ Good cause exists for this Motion because the Complaint filed by Plaintiffs is complex, Allstate intends to make several dispositive arguments for its dismissal, and judicial efficiency will be served by allowing all dispositive arguments to be made in one answering brief.

Plaintiffs’ 40-page Complaint seeks certification of two separate classes premised on two causes of action alleging violations of Texas Insurance Code. Specifically, Plaintiffs allege that Allstate is engaged in two related and discriminatory schemes that involve unfairly charging higher premiums to its personal automotive insurance policyholders.

Allstate intends to file a dispositive motion pursuant to Fed. R. Civ. P. 12(b) in response to the Complaint. As part of that motion, Allstate intends to invoke multiple subparts of Rule

¹ This Motion is made subject to and without waiving Allstate’s motion to dismiss Plaintiffs’ Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2) based on lack of personal jurisdiction.

12(b) to explain why each of Plaintiffs' claims should be dismissed. The motion must address separate causes of action involving multiple alleged complex and comprehensive schemes and must also set forth the separate legal standards and authorities that apply to each of Plaintiffs' causes of action. Having carefully considered the arguments it must make, Allstate believes the extra pages requested will allow it to adequately address the allegations of Plaintiffs' Complaint and to make appropriate and legally supported arguments for dismissal.

Allstate's Motion to extend the page limit is not submitted for the purpose of delay, but rather so that justice may be served. Allstate intends to address all grounds for dismissal in one dispositive motion rather than successive motions, which will enable the Court to make one determination with respect to dismissal and thereby speed resolution of this lawsuit. Further, counsel for Allstate has conferred with counsel for Plaintiffs, and Plaintiffs' counsel has indicated that Plaintiffs do not oppose this request.

For all the foregoing reasons, Allstate respectfully requests that the Court enter an order granting Allstate's Motion and increase its page limit for a dispositive motion to 40 pages.

Dated: June 23, 2020

Respectfully submitted,

/s/ Amy L. Ruhland

Amy L. Ruhland (Rudd)

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**ATTORNEYS FOR DEFENDANT THE
ALLSTATE CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of June, 2020, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to:

ATTORNEYS FOR PLAINTIFFS

/s/ Amy L. Ruhland

Amy L. Ruhland (Rudd)